

**SUMMARY OF THE
ENVIRONMENTAL LABORATORY ADVISORY BOARD MEETING
JUNE 28, 2000**

The Environmental Laboratory Accreditation Board (ELAB) met on Wednesday, June 28, 2000, at 1:30 p.m. Eastern Daylight Time (EDT) during the Sixth National Environmental Laboratory Accreditation Conference (NELAC) Annual Meeting in Williamsburg, VA. The meeting was led by its chair Dr. J. Wilson Hershey of Lancaster Laboratories, Inc. A list of action items is given in Attachment A. A list of participants is given in Attachment B. The meeting agenda is given in Attachment C. A summary of the current status of ELAB recommendations is given in Attachment D.

INTRODUCTION

The meeting was called to order by ELAB's Designated Federal Officer (DFO), Mr. David Friedman of the United States Environmental Protection Agency (EPA). Mr. Friedman then turned the meeting over to Dr. Hershey, who welcomed attendees and reviewed the meeting agenda. Following an introduction of ELAB members, the minutes from the May 11 teleconference were reviewed and accepted as written. The status of action items from ELAB's April 11 and May 11 teleconferences was also reviewed.

LEGAL CHAIN OF CUSTODY UPDATE

In completion of action item 12 from ELAB's May 11 teleconference, Mr. Joe Slayton, chair of the NELAC Quality Systems Committee, updated ELAB on the status of legal chain of custody protocol issues. Mr. Slayton reported that input from the NELAC accrediting authorities indicated no desire to keep the legal chain of custody section of the NELAC Quality Systems Standard (Chapter 5). Consequently, the Quality Systems Committee has eliminated Appendix E and has proposed new language requiring laboratories to have written procedures addressing how they would handle a request from a client for a legal chain of custody to be used for evidentiary purposes.

SUBCOMMITTEE REPORTS

Performance Based Measurement Systems (PBMS) Subcommittee - Dr. Harry Gearhart, Chair

- C First initiative - To identify an Agency or extra-Agency initiative considered key to the overall laboratory accreditation scheme, and to invite someone associated with that activity to make a presentation to ELAB

Mr. David Friedman will report on American Standards and Testing Materials (ASTM) Committee D-34 activities to define how measurement system verification should be performed and documented under PBMS.

- C Second initiative - To contact EPA officials on behalf of ELAB to learn more about the PBMS implementation process and to determine if EPA sees any value in collaborating with ELAB on PBMS implementation

The subcommittee has contacted Mr. Barry Lesnick of EPA's Office of Solid Waste (OSW). OSW sees value in a joint effort with ELAB toward enhanced communication and training for stakeholders. To pursue this effort, ELAB needs to determine who would be willing to participate and how expenses would be covered. The subcommittee has also contacted Ms. Denise Wright of EPA's Office of Prevention, Pesticides, and Toxic Substances (OPPTS). She described an effort to facilitate PBMS implementation by incorporating appropriate latitude in new regulations but did not see cooperative issues.

- C Third initiative - To undertake a critical review of the EPA PBMS Initiative on behalf of ELAB to summarize efforts made to date by governmental agencies and groups outside government to define, decide, and implement PBMS

A draft of the subcommittee's critical review should be ready by November 2000 for ELAB review before distribution to the NELAC Board of Directors (BoD) and EPA. It will cover PBMS implementation strategies, tactics, schedules, and progress and will summarize stakeholder response and perceived benefits and concerns. In addition, the critical review will evaluate progress to date and offer recommendations for future courses of action for PBMS implementation and its potential for NELAC.

EPA PBMS Activities/ASTM Development of Method Verification Standard - Mr. David Friedman

In order to maintain the continuity of the meeting, Dr. Hershey called upon Mr. Friedman to make his presentations following Dr. Gearhart's subcommittee report.

- C PBMS Update - Mr. Friedman described PBMS as an effort to change the way EPA writes regulations that specify environmental monitoring. PBMS is a move away from specifying how to conduct the monitoring toward specifying how good the monitoring must be. Progress on the implementation of PBMS has been slow for several reasons, the greatest being a lack of Agency resources. Funds within the EPA budget are earmarked, making it difficult for the Agency to act on discretionary issues. Next year's budget may offer some relief. A second impediment to progress is the need to teach the regulation writers about PBMS and how it affects the regulations they write. The Agency is developing courses that consist of a generic module that covers the basic principles of PBMS and a group of program-specific modules. The drafted course offerings may be available to Regional offices by October 2000. Finally, there is a lack of consensus within and outside the Agency on how to verify and document the quality of the method for generating data. A workgroup within ASTM Committee D34 is addressing this lack of consensus. Mr Friedman noted that NELAC will play a key role in the implementation of PBMS through changing the NELAC Standards such that they are compatible with PBMS and through educating the monitoring community.

C ASTM Development of Method Verification Standard - In reference to the lack of consensus on how a laboratory verifies the quality of its methods, Mr. Friedman described a workgroup formed in the summer of 1999 under a subcommittee of ASTM Committee D34. The objective of the workgroup is to develop application-specific documentation procedures that will allow people within and outside a testing laboratory to look at data and verify with a high degree of confidence that the method used to produce that data met its intended purpose and the data is valid. He further explained a process by which the laboratory demonstrates the validity of its data to the client who, in turn, uses the data for compliance monitoring purposes. The workgroup hopes to have completed a draft standard for review by the ASTM subcommittee by June 30, 2000. If the draft standard is deemed by the subcommittee to be ready for outside review, it will be forwarded to the complete Committee D34.

Dr. Gearhart noted that a high level of enthusiasm had been expressed for PBMS in the meeting held earlier in the week with EPA officials and the NELAC BoD and suggested that documentation of what is needed from ELAB and how it will fit into NELAC would enable ELAB to consider rechartering the PBMS Subcommittee to work together with EPA and NELAC. It was suggested that Dr. Hershey draft a letter to Dr. Norine Noonan, Assistant Administrator of EPA's Office of Research and Development (ORD), confirming the conversation and asking for verification of the request for assistance. When informed by Dr. Ken Jackson of the NELAC BoD that the BoD had communicated their willingness to work with EPA and other agencies only the week before, however, the members of ELAB decided to wait for additional information before proceeding.

NELAC/ISO Consistency Subcommittee - Mr. Peter Spath, Chair

Mr. Spath reported that Ms. Roxanne Robinson of the American Association for Laboratory Accreditation (A2LA) had made a presentation at the June 26 ELAB open forum. The presentation briefly compared and contrasted ISO 17025 requirements to the NELAC requirements. He noted that there have been recommendations to expeditiously implement ISO 17025 into the NELAC Standards and asked for input regarding the direction the NELAC/ISO Consistency Subcommittee should take. After brief discussion in which it was noted that the NELAC Quality Systems Committee has established a timetable for updating the Quality Systems Standard and hopes to embrace ISO 17025 by the sixth interim meeting, ELAB decided to wait for Quality Systems Committee action before asking more of the subcommittee. The ELAB NELAC/ISO Consistency Subcommittee is currently inactive.

Regulatory Consistency Subcommittee - Ms. Zonetta English, Chair

The subcommittee, whose objective is to summarize any regulations inconsistent with the NELAC Standards with emphasis on inconsistencies in Quality Systems, met via teleconference on May 16 and June 1, 2000. The subcommittee will review proposed regulations, guidance documents, and methods for which the comment period has not yet expired. Mr. Jerry Parr has volunteered to locate and screen such documents in order to determine the deadline for comments. As a result of the subcommittee's June 1 teleconference, Mr. Parr reviewed several proposed regulations for which the comment period

has not yet expired and found that only the proposed Resource Conservation and Recovery Act (RCRA) Hazardous Waste Identification Rule (HWIR) warranted comment. In response to a question about the scope of the review of the HWIR and other documents, Mr. Parr explained that the subcommittee's review would cover anything within the scope of NELAC. This would include field activities but would not enter into risk assessment.

Third-Party Assessor Credentials Subcommittee - Mr. Mark Marcus, Chair

Mr. Marcus reported that the subcommittee submitted its proposed charter to ELAB and received comments that need to be taken back to the subcommittee for review. The revised charter should be completed by mid-July 2000. Mr. Marcus encouraged anyone interested in serving on the subcommittee to contact him.

Scope of Accreditation Subcommittee - Mr. Jerry Parr, Chair

Mr. Parr referenced the subcommittee's report that had been included in meeting packets. The subcommittee identified several Scope of Accreditation options and summarized the advantages and disadvantages of each option. The subcommittee did not arrive at a definitive recommendation for any one option due to lack of time to thoroughly debate such a complex issue. After minimal discussion, it was agreed that the subcommittee has served its purpose to generate discussion of the issue and is now concluded.

Quality Control (QC) Standards Subcommittee - Mr. Jerry Parr, Chair

Mr. Parr explained that the QC-related issues of concern to the subcommittee include matrix spikes and method blanks as specified in Appendix D (Essential QC Requirements) of the NELAC Quality Systems Standard (Chapter 5). A report on the issue was submitted via electronic mail to the NELAC Quality Systems Committee and the NELAC BoD in May 2000. Due to an electronic glitch, however, the Quality Systems Committee did not receive the report until late June 2000. For this reason, revised language will not be brought up for vote at NELAC VI. Mr. Parr noted that a limited number of hardcopies of the report were available at the meeting. He requested that both the Scope of Accreditation and Matrix Spike Issues reports be posted on the NELAC Website and suggested that comments on the matrix spike issue be directed to the Quality Systems Committee. It was agreed that the subcommittee has served its purpose to generate discussion of the issue and is now concluded.

Measurement of Source Emissions (MSE) Subcommittee - Mr. Scott Evans, Chair

Mr. Evans, of the Environmental Data Improvement Group (EDIG), reported that the ELAB subcommittee was re-formed as the Air Source Emission Task Team (ASETT), following a meeting of the NELAC Field Activities MSE Subcommittee and other interested parties in Research Triangle Park, North Carolina, on June 14 and June 15, 2000. Although ASETT has not yet generated a work product, the subcommittee developed a statement of purpose, essential elements and guiding directives for the final work product, and a timetable for milestone events. These elements are available for review on the NELAC Website. ASETT's primary purpose is to provide objective performance

criteria for the development of an acceptable quality standard for air emission testing and sampling to be uniformly implemented on a national basis. ASETT will meet via biweekly teleconferences with a goal of producing a draft standard by September 1, 2000, for presentation to the Conference at the Sixth NELAC Interim Meeting in November. Mr. Evans noted that ASETT membership is open to everyone and suggested that the task team would benefit from additional regulated source members. He announced the availability of an ASETT discussion group available for stakeholder input on the EDIG Website at <http://www.betterdata.org>.

As an ELAB subcommittee, ASETT will report to ELAB for communication to the NELAC Field Activities Committee. The draft document produced by ASETT will be reviewed by ELAB. ELAB may then choose to forward the document in the form of a recommendation to another body, such as NELAC. In discussion from the floor, a commenter from the Louisiana Department of Environmental Quality communicated his state's intent to accredit stack testers according to the NELAC Standards already in place. The commenter suggested that there is no need to start from scratch in developing a MSE Standard and expressed the need for more realistic and more affordable MSE proficiency testing (PT) samples.

UPDATE ON DEPARTMENT OF TRANSPORTATION (DOT)/EPA SAMPLE SHIPPING ISSUES

Mr. Friedman reported that he had discussed this issue with DOT staff responsible for their pH requirements. DOT requires that samples be shipped with a pH greater than 1.96 while EPA requires that samples be preserved with a pH less than 2. In response to EPA communications, DOT offered to exempt only EPA from the DOT pH requirement. Since this exemption is not sufficient, EPA has drafted a petition packet to DOT spelling out the problem, summarizing what is known about the issue, and suggesting specific action. With the proposal of specific action, EPA is asking DOT to issue a letter clarifying that environmental samples that do not fit the definition of a hazardous substance before their preservation to meet EPA requirements are not made hazardous by the preservation, provided the sample does not have corrosive potential and is overpacked such that sample material is contained in the event of a breach of the primary container. Additionally, EPA is asking DOT to amend the DOT regulations to specifically exempt preserved samples without headspace. Mr. Friedman noted that ELAB has provided valuable information for the preparation of the petition packet. He appealed for additional assistance from individuals who have experienced problems shipping preserved samples, chemists, and hazardous waste shippers who are experts on the DOT regulations regarding shipping. In discussion of the issue from the floor, it was noted that there is no small-quantity exemption for environmental samples. It was also noted that EPA is seeking a general exemption covering not just acid-preserved samples but also samples such as methanol-preserved soils. Mr. Friedman indicated that he will distribute the petition packet information to ELAB.

EXPANDED PT SCOPE

Ms. Barbara Burmeister, chair of the NELAC PT Committee, distributed a hand-out that reported the status of the expanded NELAC PT program and summarized six unresolved issues regarding the NELAC PT program. An expanded list of PT samples was developed by the NELAC PT Committee in February 2000. The list, consisting of three analyte tables (Safe Drinking Water Act (SDWA) water

analytes, Clean Water Act (CWA) water analytes, and Resource Conservation and Recovery Act (RCRA) solid analytes) was posted on the NELAC Website in April 2000. An errata sheet to these tables will also be posted on the NELAC Website. In discussion of the six unresolved issues regarding the NELAC PT program, members of ELAB noted that issues two through five are especially serious. The issues and subsequent discussion are summarized as follows:

- C No defined entity at the present time who will designate a PTOB/PTPA

Proposed language from the NELAC PT Committee will enable the NELAC BoD to serve this function with final authority coming from NELAP.

- C Lack of oversight from NIST/NVLAP; no response to date from NIST/NVLAP regarding results of PT provider analyses

The NELAC PT Committee has sent a letter to NIST/NVLAP asking for the status of the ongoing PT provider oversight and has received an acknowledgement from Mr. Douglas Faison of NIST's Laboratory Accreditation Program indicating that a formal response will be forthcoming. In discussion of the anticipated response, Ms. Burmeister noted that NIST has stated its preference to be an accreditor rather than a regulator. Although the NELAC PT Committee expected substantial PT provider oversight when they developed the appendices to their Standard, NELAC stakeholders will have to wait for NIST's response to the PT Committee comments to know what level of oversight NIST is providing. In the event a laboratory has problems with a PT provider, the laboratory can appeal to NIST and the laboratory's accrediting authority. Ms. Burmeister noted that the burden of PT provider oversight is falling on the accrediting authorities. The NELAC PT Committee will form an *ad hoc* subcommittee to consist of PT providers, laboratories, and accrediting authorities. The subcommittee, chaired by Mr. Larry Jackson, will address general standardization issues such as how to apply scored PT reports to the Scope of Accreditation. After moderate discussion, it was moved, seconded, and approved unanimously that

ELAB appoint a liaison to the NELAC PT Committee's *ad hoc* subcommittee on PT standardization issues.

Ms. Connie Hull will serve as ELAB's liaison to the *ad hoc* PT subcommittee.

There was substantial discussion from the floor on the PT provider oversight issue. A commenter from a testing laboratory, noting the great expense of PT samples, expressed alarm that there is not greater assurance of sample quality and urged the expeditious resolution of the issue. In response, a PT provider noted that samples are thoroughly tested and suggested that the problem lies in knowing where we stand with ongoing oversight. It was noted that NIST conducted a PT provider study in October 1999, but providers have not yet received their scores. Although PT providers are required to submit to NIST three vials from every sample lot prepared, they have received no feedback to date. It was also noted that NIST is legally prohibited from sharing information about PT providers with outside entities. When the

externalized Water Supply/Water Pollution (WS/WP) PT program was set up, NIST was expected to monitor and discreetly work with any PT provider that was having problems and to report to EPA annually on such provider problems. If the externalized WS/WP PT program has been successful no information will have been made public. Following discussion of the issue, it was moved, seconded, and approved unanimously that

ELAB draft a letter to Mr. Robert Graves of EPA's Cincinnati office requesting an interim status report on the externalization of the WS/WP PT program.

- C No PT provider caucus scheduled to date

It was suggested that an annual PT provider caucus be held concurrent with NELAC interim meetings. There was discussion from the floor concerning possible problems associated with face-to-face meetings between providers and the people for whom they provide PT samples.

- C No feedback to date from EPA for provider data submitted on computer discs since October 1999

This issue has been partially resolved with a recent letter from EPA's Cincinnati office regarding electronic data format problems.

- C No PT database to date; when operational, database will be limited to water analytes

Ms. Burmeister identified this issue as her number one concern. Although EPA's Cincinnati office will maintain a database for water analytes, there is no place for solid and hazardous waste data with oversight. In discussion from the floor, it was suggested that ELAB form a subcommittee of database experts and PT experts to investigate and make recommendations on the consolidation of the PT database(s) and NELAP national database so as to eliminate redundant information. Discussion of this suggestion was deferred by ELAB to a future teleconference.

- C Inconsistency between Scope of Accreditation and PT Fields of Testing

Ms. Burmeister suggested that this issue will be resolved in the coming year through joint meetings of stakeholders and the NELAC PT, Program Policy and Structure, and Transition Committees.

RECOMMENDATIONS ON STANDARDS

Accreditation Process

There was considerable discussion from the floor on mobile laboratory accreditation issues. Mr. Gleason Wheatley, representing the NELAC Accreditation Process Committee, summarized for ELAB the committee's laboratory accreditation scheme as follows:

- C Fixed-base laboratory - requires separate accreditation
- C Noncontiguous laboratories that could be considered part of one laboratory - subject to primary accrediting authority review and decision
- C Mobile laboratory -
 - C Associated with fixed-base laboratory -
 - C Operating within home state - may require separate accreditation at the discretion of the primary accrediting authority
 - C Operating outside home state - requires separate accreditation
 - C Operating under a different Quality System - requires separate accreditation
 - C Not associated with fixed-base laboratory - requires separate accreditation

Commenters raised questions of what constitutes a mobile laboratory and to whom a mobile laboratory must apply for primary accreditation. Suggesting that accreditation should address the quality system that operates a mobile laboratory rather than the mobile laboratory, itself, several commenters urged ELAB to recommend that the Accreditation Process Committee pull and reexamine the Accreditation Process Standard. In response, ELAB expressed confidence in the NELAC committee process. Noting that ISO 17025, Section 4.1.3 addresses the issue, ELAB decided to table the issue for discussion after the implementation of ISO 17025 into the NELAC Standards.

Quality Systems

There was some discussion of small laboratory microbiology issues associated with Appendix D.3 of the NELAC Quality Systems Standard. It was noted that the accrediting authorities of Oregon and New Hampshire had drafted an amendment to the Quality Systems Committee's proposed language. Pending the acceptance of this amendment from the floor during the voting session, both Oregon and New Hampshire would vote for the Standard. Members of ELAB noted that small laboratory microbiology issues had also been raised during the June 26 ELAB Open Forum and that Open Forum issues would receive additional attention later on the agenda. After moderate discussion in which ELAB acknowledged a problem with the microbiological aspect of Appendix D, it was moved, seconded, and approved unanimously that

ELAB urge NELAC voting members to adopt all proposed NELAC Standards as presented in the sixth annual voting session with the exception of Appendix D.3 to the Quality Systems Standard. ELAB takes no position on Appendix D.3.

OUTREACH TO STATES

Dr. Hershey noted that he had set aside time on the meeting agenda to brainstorm ways ELAB can encourage additional states to become NELAP-recognized accrediting authorities. He invited Ms.

Ilona Taunton of Test America Incorporated to present the results of a survey she has conducted of the 50 states on the status of laboratory certification. Ms. Taunton presented her survey results as follows:

What types of laboratory certification programs are administered by the states?

- C Seventeen states currently have only drinking water (DW) certification programs.
- C Twenty-eight states have DW and at least one other certification program (RCRA, Underground Storage Tank (UST), solid waste (SW), etc.).
- C Three states have DW certification programs and special methods for UST.
- C One state has only special methods for UST.
- C One state has no laboratory certification program.
- C Twenty-three states require some special methodology for UST. (If EPA SW Method 5035 were included in these methodologies, the number would be higher.)

Do additional states intend to apply to become NELAP-recognized accrediting authorities?

- C Nine states did not respond to the question.
- C Ten states will not apply. (Eight of these states have only DW certification programs. Some of these states will accept reciprocity under NELAC.)
- C Thirteen states are undecided. (Ten of these states have programs in addition to DW. Reasons given for indecision include political opposition, funding, and reservations about the NELAC program. Some states are waiting to see the direction NELAC takes at the sixth annual meeting.)
- C Six states (seven with the recent withdrawal of Colorado as a NELAP-recognized accrediting authority) are planning to apply to become accrediting authorities.

Dr. Hershey suggested that ELAB create a list of multiple-program states that do not currently intend to become NELAP-recognized accrediting authorities and develop some sort of outreach program to those states. It was also suggested that ELAB extend the outreach program to other federal agencies such as DOT and the United States Postal Service (USPS). After brief discussion, the issue was deferred to a future teleconference in which Ms. Taunton will be invited to participate.

OPEN FORUM ISSUES

Dr. Hershey enumerated issues that were raised in the ELAB Open Forum on June 26, 2000. Their disposition is summarized as follows:

- C Recommendation that ELAB carefully review language of proposed air testing appendix to NELAC Quality Systems Standard, especially D.5.0 Introduction, for consistency with the needs of the new field workgroup dealing with stack testing

This issue was referred to ASETT.

- C NELAC structural issues

- C NELAC committees to adopt open meeting policy
- C ELAB to encourage NELAC Policy & Structure Committee to find ways to increase contributor participation, to culminate in contributor voting
- C ELAB to encourage greater separation between EPA & NELAC
- C NELAC to consider closer ties with NIST & NACLA, leading to single system of accreditation

Dr. Hershey conducted an informal straw poll of stakeholders present at the meeting. Forty-five attendees indicated by show of hands that they support continuation of the NELAC process as is. Thirteen attendees indicated by show of hands that they believe there is a need to reexamine NELAC structural issues. The issue was deferred for consideration in a future teleconference.

- C The ACIL Representative expressed strong support for NELAC, and reported on the following ACIL consensus positions:
 - C Support for revision of fields of testing to eliminate program & analyte
 - C Urge NELAC Quality Systems Committee to expedite implementation of ISO 17025 and to make recommended changes to Appendix D-1
 - C Urge NELAC Quality Systems Committee to remove legal chain of custody language in Section 5.12.4 and maintain sample tracking language in Section 5.12.3 (There was considerable follow-up discussion of legal chain of custody.)
 - C Support move to nonprofit organization but believe continued EPA participation, especially in publication of Standards, to be important

ELAB noted that these issues have been satisfactorily addressed through committee meetings and other discussions.

- C Microbiology issues:
 - C Excessive QA requirements for small labs; cumbersome set of requirements in D.3 could pose long-term problem
 - C Suggestion that ELAB assemble cross-sectional group of microbiologists to review language in D.3 and make suggestions for streamlining. Examine in particular:
 - C autoclave efficiency & effectiveness evaluation
 - C inhibitory residue test
 - C concept of test variability testing for micro (D.3.2)

After brief discussion of the issue, the members of ELAB decided to pass this information along to the NELAC Quality Systems Committee. It was moved, seconded, and approved unanimously that

ELAB recommend that the NELAC Quality Systems Committee assemble a cross-sectional group of microbiologists (state drinking water and waste water assessors, private and commercial drinking water and waste water laboratories, municipal water

systems, EPA personnel responsible for writing the water certification manual, RCRA personnel, etc.) to review and revise the language in Appendix D.3.

- C Two-tiered states subcontracting issue - change language to allow subcontracting of overflow work to a lab in the state from which the samples came?

After brief discussion of Section 5.14b of the NELAC Quality Systems Standard (Chapter 5), this issue was referred to the NELAP Accrediting Authorities. It was moved, seconded, and approved unanimously that

ELAB recommend that the NELAP Accrediting Authorities consider the two-tiered states subcontracting issue for resolution of apparent conflicts.

NEW BUSINESS

Outreach Through Overview of NELAC

Ms. English suggested that ELAB recommend to NELAC that an overview of NELAC be offered to new participants prior to the opening plenary of each NELAC meeting. In the ensuing discussion, it was suggested that such an overview might be better received by stakeholders if it includes private-sector participation. In response, Mr. Parr and Mr. Chuck Wibby of Environmental Resources Associates volunteered to prepare such a presentation. Ms. Jeanne Hankins, NELAC Director, indicated that she will work with Mr. Parr and Mr. Wibby to facilitate the presentation. It was also noted that new participants can be referred to the short summary of NELAC presented in the introduction to the NELAC Program Policy and Structure Standard (Chapter 1).

Effective Date of NELAC Standards

It was suggested that a timeline be presented at either the NELAC opening or closing plenary to clarify which NELAC Standards will be used to assess laboratories between January and July 1 of each year. It was suggested that some stakeholders are not clear on the NELAC process. In discussion of this issue, a potentially problematic example was given in which a laboratory is found deficient on some part of the NELAC Standards early in the year and is trying to correct that deficiency when that part of the Standards is deleted at the NELAC annual meeting. It was noted that the state process is not imposed by NELAC. Some states must vote the NELAC Standards into their administrative code. Ms. Hankins pointed out that there is a two-year extension for states that must change their state regulations to adopt the Standards. After moderate discussion, the issue was tabled for discussion at a future teleconference.

CONCLUSION

Since the allotted time for the meeting was drawing to a close, it was decided that Mr. Friedman will schedule a teleconference for early August 2000 to discuss the status of high-priority items remaining among ELAB recommendations. The meeting was adjourned by Mr. Friedman.

ACTION ITEMS
ENVIRONMENTAL LABORATORY ADVISORY BOARD
JUNE 26, 2000

| Item No. | Action | Date to be Completed |
|-----------------|--|-----------------------------|
| 1. | PBMS Subcommittee will complete critical review of the EPA PBMS Initiative. | 11/00 |
| 2. | Third-Party Assessor Credentials Subcommittee will complete revised charter. | 7/31/00 |
| 3. | Scope of Accreditation and QC Standards Subcommittee reports will be posted on the NELAC Website. | |
| 4. | ASSETT will complete draft MSE Standard for ELAB review. | 9/1/00 |
| 5. | Mr. Friedman will distribute DOT petition packet information to ELAB. | |
| 6. | Ms. Hull will serve as ELAB liaison to the NELAC <i>ad hoc</i> PT subcommittee on PT standardization issues. | Ongoing |
| 7. | Dr. Hershey will draft a letter on behalf of ELAB to Mr. Robert Graves of EPA's Cincinnati office requesting an interim status report on the externalization of the WS/WP PT program. | |
| 8. | ELAB will consider suggestion that they form a subcommittee to examine database needs and make recommendations for the consolidation of the NELAC National Database and PT Database(s) to eliminate redundant information. | |
| 9. | ELAB will revisit issue of mobile laboratory accreditation after implementation of ISO 17025 into NELAC Standards. | |
| 10. | ELAB will recommend that the NELAC Quality Systems Committee assemble a cross-sectional group of microbiologists to give practical input on Appendix D.3. | |
| 11. | ELAB will refer two-tiered states subcontracting issue to NELAP Accrediting Authorities for resolution of apparent conflict. | |
| 12. | Mr. Parr and Mr. Wibby will collaborate with Ms. Hankins to produce an overview of NELAC suitable for presentation to new participants at NELAC meetings. | |

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DECEMBER 17, 1999

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JUNE 28, 2000

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Environmental Laboratory Advisory Board (ELAB)

June 28, 2000
1:30 - 5:30 p.m.

Radisson Fort Magruder Inn and Conference Center
Williamsburg, Virginia

Agenda

1. Review May 11 minutes - Wilson Hershey
2. Review action items from April 11, May 11 minutes - Wilson Hershey
3. Legal chain of custody update - Joe Slayton
4. Subcommittee reports by subcommittee chairs
 - C Performance Based Measurement Systems - Harry Gearhart
 - C NELAC/ISO Consistency - Peter Spath
 - C Regulatory Consistency - Zonetta English
 - C National Laboratory Accreditation - Jerry Parr
 - C Third-Party Assessor Credentials - Mark Marcus
 - C Scope of Accreditation - Jerry Parr
 - C Measurement of Source Emissions - Scott Evans
 - C Matrix Spikes/QC Related Issues
5. Update on DOT/EPA sample shipping issues - David Friedman
6. ASTM Development of Method Verification Standard - David Friedman
7. EPA PBMS activities - David Friedman
8. Expanded PT scope - Barbara Burmeister
9. Brainstorm ways ELAB can encourage additional states to become accrediting authorities - Wilson Hershey
- 9a. Recommendations on NELAC Standards
10. Open forum issues
11. New business

LISTING & STATUS OF ELAB RECOMMENDATIONS

Priorities Defined

HIGH - activity is an urgent matter; an ELAB member has been assigned to monitor progress on the recommendation

MEDIUM - activity is of importance to ELAB; ELAB will monitor progress periodically

INACTIVE - activity either has been dealt with under another recommendation or is no longer applicable

COMPLETED - recommendation has been addressed or acted upon by ELAB or another organization

| Rec # | Date of Rec | Recommendation | Notes | Action | ELAB Priority |
|-------|-------------|--|-------|--|---------------|
| 1 | 2/6/97 | The GLP Subcommittee will present a final report and recommendations at the next ELAB meeting in July, 1997. | | ELAB completed report. Awaiting response from EPA EMMC Policy Council. Letter received from EPA/OECA 4/15/99; forwarded letter to NELAC. | COMPLETED |
| 2A | 2/6/97 | The issue of how to define the basis for NELAC accreditation is of concern to the laboratory community and should continue to be addressed jointly by the NELAC Committees on Proficiency Testing and Program Policy and Structure. ELAB participation in the effort will be the responsibility of Mr. Coyner and Ms. Moore, who are members of the Proficiency Testing and Program Policy and Structure Committees, respectively. | | Recommendation remains open. Awaiting action from NELAC PT and PPS committees and ELAB members. | INACTIVE |
| 2B | 2/6/97 | ELAB recommends to EMMC and the NELAC Board of Directors, regarding proficiency testing, that the goal of the NELAC PT program should be to provide full-volume, real-world samples, keeping in mind considerations of practicality and cost. | | Recommendation remains open. Awaiting action from NELAC Board and EMMC Policy Council | COMPLETED |

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|-------|-------------|---|-------|---|---------------|
| 2C | 2/6/97 | ELAB recommends to EMMC and the NELAC Board of Directors, regarding proficiency testing, that the USEPA serve as the oversight body for the PT program, with the necessary resources and commitment to improve the current system. Alternatively, ELAB recommends that the oversight body be another government organization and that steps be taken to ensure a smooth transition. | | Completed - NIST to serve as PTOB | COMPLETED |
| 3 | 2/6/97 | ELAB will recommend to the NELAC Board of Directors that the Program Policy and Structure Committee address the issue of how to recognize an appropriate role for Native American Tribal Nations in NELAC | | Recommendation remains open. Awaiting action from NELAC Board and PPS committee | MEDIUM |
| 4 | 2/6/97 | With regard to the role of private-sector accrediting bodies in NELAC, ELAB will recommend to the NELAC Board of Directors that the NELAC national database include publicly available information describing the functions performed by individual private organizations for specific State programs | | Recommendation remains open. Awaiting action from NELAC Board | HIGH |
| 5A | 2/6/97 | ELAB recommends to the EMMC and the NELAC Board of Directors that US EPA's programs and Regions and the States work to implement PBMS consistently. | | Recommendation remains open. Awaiting Action from NELAC Board and EMMC Policy Council. Assigned to PBMS subcommittee 12/17/99 D. Friedman (EPA/ORD) made short presentation on PBMS at the 6/28/00 (NELAC VI) ELAB meeting. | HIGH |

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| 5B | 2/6/97 | ELAB recommends to the EMMC and the NELAC Board of Directors that training in implementation of PBMS is needed for State Laboratory inspectors | | Recommendation remains open. Awaiting action from NELAC Board and EMMC PC. Assigned to PBMS subcommittee 12/17/99. | HIGH |
| 5C | 2/6/97 | ELAB recommends to the EMMC and the NELAC Board of Directors that a representative from the EMMC Work Group on PBMS work with the ELAB PBMS Subcommittee in the future | | L. Williams, L. Autry, and B. Runyon, all from EPA, participated on the PBMS subcommittee | COMPLETED |
| 6 | 7/28/97 | ELAB recommends that EPA prepare a working set of PT sample design criteria which meet Program Office requirements to be used by the Proficiency Testing Oversight Body (PTOB) to include, at a minimum, concentration, interferences, media. | NELAC is working with EPA/EMMC to develop specifications for proficiency testing (PT) sample design criteria for use by the Proficiency Testing Oversight Body (PTOB). EPA is also working with NIST to develop a draft of the standard. The draft is currently awaiting response from EPA | Recommendation remains open. Criteria have been developed for the Water Pollution (WP) and Water Supply (WS) samples. ELAB wishes to reinforce that the recommendation is still important. Awaiting action from EPA Program offices for criteria other than WP and WS. Will be addressed under #39. | INACTIVE |
| 7 | 7/28/97 | ELAB recommends that NELAC/NIST/EPA develop a protocol which can be used by the PTOB, through review and analysis of data, to assure program equivalency among PT providers. (See attached paper by Dan Tholen for starting point.) ELAB further recommends that this protocol be finalized as soon as possible to ensure the integrity of this program | The NELAC PT committee has worked with NIST and EPA to produce a draft standard for PTOB to assure equivalence among PT providers. An overview of the draft document, Handbook 150-xx, was given by NIST in the NIST Open Meeting on the morning of 1/16/98. NIST reviewed Handbook 150-xx and requested public comments by 3/15/98. Members of the ELAB were impressed with the draft document and the cooperation with NIST and EPA | Completed. ELAB sent a letter to EPA and NIST complimenting them on their work to date on developing Handbook 150-xx | COMPLETED |

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|-------|-------------|---|---|---|---------------|
| 8 | 7/28/97 | ELAB recommends to NELAC that the periodic PT studies occur at fixed times throughout the year. ELAB further recommends that initial and remedial PT samples may be obtained outside this schedule | ELAB has formerly recommended to NELAC that periodic PT studies be conducted at fixed times throughout the year. The problems created by labs not being able to receive or reinstate accreditation due to scheduling were discussed. ELAB is concerned about the effect of having only two opportunities per year for obtaining PT samples, will have on the accreditation process, both initial and remedial. recommends that ensure that the PT system not delay the laboratory accreditation process by more than thirty days. | PT standards have been revised to indicate that accrediting authority may set the schedule. Remedial samples may be obtained | COMPLETED |
| 9A | 7/28/97 | ELAB recommends that the long range goal of NELAC be to develop a consistent approach to both scope of accreditation and PT program sample design, which recognizes the needs of the laboratories, the primary accrediting authorities, and the Agency, particularly with regard to performance based methods, similar technologies, and analytical capabilities. | The goal to develop a consistent scope of accreditation and PT programs has been endorsed by the NELAC PT Committee. ELAB discussed the need for the scope of accreditation and PT programs to address performance based measurement systems (PBMS), similar technologies, and analytical capabilities. It was suggested since PBMS is still under development by EPA, NELAC should monitor progress in the program to avoid any delays in the implementation of the NELAC PT program | Recommendation remains open. Awaiting action from NELAC PT and PPS committees. New ELAB subcommittee addressing scope of accreditation issue. Assigned to PBMS subcommittee 12/17/99 | ACTIVE |

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|-------|-------------|---|--|---|---------------|
| 9B | 7/28/97 | ELAB recommends that the PTOB, during implementation of the PT program, require that each PT provider record and report PT results to both the accrediting authority and the PTOB on a method basis, by matrix and analyte. | NELAC is awaiting EPA specifications for reporting by method, matrix, and analyte. ELAB will recommend that the Proficiency Testing Oversight Body (PTOB) require that each PT provider record and report PT results to both the accrediting authority and to the PTOB to meet the EPA specifications. | Completed. The PT committee's proposed standards for program/matrix/analyte was adopted by NELAC. | COMPLETED |
| 9C | 7/28/97 | ELAB recommends to NELAC that a task group monitor the impact on implementation of the discrepancy between PT program design and the scope of accreditation. | | Recommendation remains open. Awaiting action from NELAC once program is operational. | INACTIVE |
| 10 | 7/28/97 | ELAB recommends that there is consistency between NELAC Standards and the EPA's PT Externalization program. | NELAC is working closely with EPA and EMMC to insure that NELAC standards are consistent with EPA's PT externalization program. A PT Committee meeting with EMMC in September 1998 indicated close cooperation in developing consistent PT standards. | Issue to be revisited in subsequent meetings. | ACTIVE |
| 11 | 7/28/97 | ELAB recommends that the proposed PT standards (including the Appendices) be adopted as presented. | The recommendation to adopt the proposed PT standards has been accomplished. | Completed. | COMPLETED |

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|-------|-------------|---|--|---|---------------|
| 12 | 7/28/97 | <p>ELAB recommends to NELAC that the GLP decisions and the NELAC timeline be decoupled.</p> <p>ELAB further recommends that the GLP subcommittee report to the ELAB at the Interim Meeting with three options including a) status quo; b) Options 1+3+5; and c) lab accreditation.</p> <p>ELAB further recommends that ISO Guide 25 be explicitly considered to understand the value it offers to the GLP process.</p> <p>ELAB further recommends that the NELAC process be evaluated to identify the value added, if any. EPA will provide language to clarify that the NELAC Constitution and Bylaws reflect that decision-making and implementation of the GLP Program will continue as an exclusively federal program.</p> <p>The goal of this activity is to provide information to OECA and OPPTS management for a decision regarding the direction of the GLP program.</p> | Addressed in the GLP report. | Completed. GLP report has been forwarded to EPA - awaiting response from EMMC Policy Council. | COMPLETED |
| 13 | 7/28/97 | <p>ELAB recommends that before EPA promulgates a regulation, it must demonstrate and document that NQOs are achievable using available measurement technology.</p> <p>Recommendations modified to: ELAB recommends that before EPA publishes a method, whether in regulation or guidance, the method must be demonstrated reliable for its stated use.</p> | <p>This recommendation was reconsidered and determined to need modification (see above). This issue was brought to the attention of the EPA Acting Deputy Administrator Peter Robertson on Marcy 9, 1999, at which time he agreed to pursue this issue with the EMMC Policy Council.</p> | <p>Recommendation remains open. Awaiting response from Deputy Administrator.</p> <p>Assigned to PBMS subcommittee 12/17/99.</p> | HIGH |

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| 14 | 7/28/97 | ELAB recommends that EPA demonstrate that any new or revised regulatory measurement requirements are achievable on samples that represent the same level of analytical challenge as the matrix for which the regulation is intended, that is, don't publish a regulation without a method that works. (Ideally, this would be samples of the actual matrix to be monitored, as defined by the regulation.) | The Board voted to include an additional clarifying phrase to the recommendation. | Recommendation remains open. Awaiting response from EMMC Policy Council. Assigned to PBMS subcommittee 12/17/99. | HIGH |
| 15 | 7/28/97 | ELAB recommends that EPA consider the following remaining issues: PB Measurement System <u>vs.</u> PB Method Sample matrix Method Validation Method Compliance Interlaboratory Comparability Cost Laboratory Client Relationship | | Recommendation has been superceded by final report of the PBMS subcommittee. Assigned to PBMS subcommittee 12/17/99. Waiting on response from Mr. David Friedman. | HIGH |
| 16 | 7/28/97 | ELAB recommends to NELAC that the initial approval of accrediting authorities should occur simultaneously | | Completed. The NELAC Transition Committee has implemented this recommendation. | COMPLETED |
| 17 | 7/28/97 | ELAB recommends to NELAC that the first round of NELAC accreditation of laboratories by accrediting authorities should also occur simultaneously. | | The NELAC Transition Committee has implemented this recommendation. | COMPLETED |

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| 18 | 7/28/97 | ELAB recommends to NELAC that prior to the designation of approved proficiency test (PT) sample providers as required by Chapter 2, accredited labs should be allowed to continue using existing PT sample providers. However, in the interim, frequency of PT sample analysis as required by Chapter 2 must be met. | | Completed. The NELAC Transition Committee has implemented this recommendation. The PT committee has modified the PT chapter to accommodate this recommendation | COMPLETED |
| 19 | 7/28/97 | ELAB recommends to NELAC that Chapter 6 be further defined regarding Accrediting Authority recognition of States to address the conflict of interest between public and private sector labs, with respect to a State laboratory conducting routine environmental testing analyses. Further definition will include the specific guidance to avoid conflict of interest for an above stated Accrediting Authority. | The NELAC Accrediting Authority Committee has implemented this recommendation. At NELAC IV further complaints were raised that the AA committee had not adequately addressed this issue. See NELAC inputs to ELAB 6/30/99. Wording proposed for NELAC standards section 6.2.2.d responds to this concern. | | COMPLETED |
| 20 | 7/28/97 | ELAB recommends to NELAC that the issue of primacy State laboratories in accrediting non-primacy State laboratories be referred to the Accrediting Authority Committee for further consideration. | | Completed. The NELAC Accrediting Authority Committee has implemented this recommendation. | COMPLETED |
| 21 | 7/28/97 | ELAB strongly recommends to NELAC a vote for adoption of the Standards with modifications as specified and passed by ELAB motions on 7/28/97. | | Complete. NELAC adopted the standards. | COMPLETED |

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| 22 | 7/28/97 | ELAB recommends that EPA Program Offices become more active in NELAC and promulgate regulations that are consistent with the NELAC standards as appropriate. | Nancy Wentworth, co-chair of the EMMC Panel on Laboratory Accreditation, discussed the steps that are being taken within the Agency to obtain a consensus opinion. In a meeting on March 9, 1999, the EPA Acting Deputy Administrator Peter Robertson agreed to pursue this. | Recommendation remains open. ELAB sent a letter to the EMMC Policy Council Co-Chairs noting that NELAC is awaiting critical input from EPA Program Offices through EMMC. ELAB encourages the Agency to provide that input in writing as soon as possible. Awaiting response from EMMC Policy Council. Assigned to Regulatory Consistency subcommittee 12/17/99. | HIGH |
| 23 | 1/16/98 | ELAB recommends to NELAC that an advisory appendix be written that addresses the issue of due process for laboratories. This appendix must address the rights, responsibilities, and obligations of the laboratories and accrediting authorities. The discussion should include, but not be limited to: I. the right of the laboratory to see the audit report prior to action; II. the right of the laboratory to privacy during review; III. the right of the laboratory to appeal prior to suspension or revocation; and IV. the right of the laboratory to confidentiality. | Recommendation remains open. Awaiting response from Accreditation Process committee. | Assigned to Z. English 12/17/99 | COMPLETED |
| 24 | 1/16/98 | ELAB strongly recommends to NELAC that, during consideration of inclusion of sampling into NELAC standards, all stakeholders be represented. | Recommendation remains open. Awaiting response from Field Measurements ad hoc committee. | This recommendation relates to #41 and will be addressed there. | INACTIVE |

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| 25 | 1/16/98 | ELAB recommends that NELAC invite the Federal Partners Committee to make a report at NELAC IV (7/28/98) on their intention to 1) participate in NELAC; b) continue their own programs; and c) to serve as accrediting authorities. | | B. Dutrow made presentation at NELAC IV plenary session on Federal Partners progress. | COMPLETED |
| 26 | 1/16/98 | ELAB recommends that EPA report on the Agency's action regarding PBMS and how it relates to the Quality Systems Chapter. | | Awaiting response from EMMC Panel on Laboratory Accreditation. Assigned to PBMS subcommittee 12/17/99 | ACTIVE |
| 27A | 7/1/98 | ELAB recommends that EPA continue the Office of Water streamlining effort as an intermediate step to PBMS. | EPA has decided to develop a formal PBMS program for the Office of Water, separate from the OW streamlining. | Recommendation remains open. Awaiting response from EMMC Policy Council. Assigned to PBMS subcommittee 12/17/99 | COMPLETED |
| 27B | 7/1/98 | ELAB recommends that a PBMS subcommittee be formed to develop and offer recommendations during NELAC IV [i] for integrating the development of NELAC and PBMS. | ELAB accepted on 12/10/98 the report of the PBMS workgroup as a product of ELAB with the incorporation of previous findings and minor editorial changes. It was decided that a formal ELAB report will be sent by ELAB to EPA with an appropriate cover letter introducing the document and its issues. The PBMS working group report has been submitted to EPA's Acting Deputy Administrator Peter Robertson, during a meeting on 3/9/99, at which time he agreed to address this issue with the EMMC Policy Council. | ELAB PBMS report on ELAB website. | COMPLETED |

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| 28 | 7/1/98 | ELAB recommends that the NELAC Program Policy and Structure Committee review the structure of the AARB, consider expanding its charter to include an annual Management Systems Review of NELAP operations by an independent organization, include state members from the accrediting authorities, and address the timing of such reviews. | | Recommendation remains open. Awaiting response from PPS committee. | COMPLETED |
| 29 | 7/1/98 | ELAB recommends that EPA and the Department of Transportation address the inconsistencies between the EPA preservation requirements and the DOT shipping requirements. | <p>ELAB sent a letter to both EPA and DOT requesting prompt resolution to this impasse. In a meeting on January 11, 1999, the EMMC Policy Council Co-chair Noreen Noonan agreed to pursue this issue.</p> <p>Exemption deemed too narrow and inefficient for our needs. Mr. Friedman has directed contractor to prepare a package to petition DOT to changes its regulations.</p> | <p>Response received from DOT stating that the shipping requirements will not be changed. Awaiting response from EMMC Policy Council.</p> <p>Mr. Friedman sending draft language to DOT to permit exemption of preserved samples.</p> <p>Petition package in development.</p> | HIGH |
| 30 | 7/1/98 | ELAB recommends that the proposed changes to the NELAC standards be adopted in the voting session scheduled for 7/2/98. | | Changes adopted. | COMPLETED |
| 31 | 7/1/98 | ELAB recommends that a third-party assessor workgroup be formed to evaluate minimum credentials for third-party assessors, both individuals and organizations. The workgroup will also review NELAC Chapter 6 to determine if the criteria are sufficient for States to evaluate third party assessors and make recommendations for revisions if not. | A work group has been formed chaired by Sandra Wroblewski and Bill Kavanagh. | <p>Awaiting product from work group.</p> <p>Assigned to Third Party Assessor Credentialing subcommittee 12/17/99.</p> | HIGH |

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| 32 | 7/1/98 | ELAB recommends that the ELAB Laboratory Assessment workgroup recommendations on checklists be forwarded to the NELAC On-site Assessment Committee for their consideration | | <p>Awaiting response from OA committee. Jerry Parr revised report for ELAB review and submission to NELAC. Report approved as final ELAB report for forwarding to NELAC and OA committee 4/29/99.</p> <p>Review of ELAB Laboratory Assessment subcommittee report assigned to J. Parr 12/17/99.</p> | HIGH |
| 33 | 7/1/98 | ELAB recommends that the NELAC Accrediting Authority Committee further define and address conflict of interest between public and private sector laboratories. | | <p>Awaiting response from AA committee. This issue will be covered in recommendation 23.</p> <p>Assigned to Z. English 12/17/99</p> | ACTIVE |
| 34 | 7/1/98 | ELAB recommends that the NELAC Accreditation Process committee develop an advisory appendix that addresses the rights, responsibilities, and obligations of laboratories and accrediting authorities. | | <p>Awaiting response from Accreditation Process committee. Issue will be covered in recommendation #23.</p> <p>Assigned to Z. English 12/17/99</p> | ACTIVE |
| 35 | 1/14/99 | ELAB recommends that NELAC reach out to laboratory associations through its web page by providing relevant links and sample standard operating procedures, case histories, sample quality manuals, and work sheets to assist small laboratories. | | | COMPLETED |

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| 36 | 1/14/99 | ELAB will ensure a flow of information and guidance to the NELAC Committees by submitting significant information on to the NELAC Membership and Outreach Committee. | | Recommendation remains open. Awaiting input from ELAB. W. Hershey to inform M&O committee of FL and KS websites to assist small labs. | INACTIVE |
| 37 | 1/14/99 | ELAB recommends that NELAC continue to ensure that the NELAC standards contain only essentials to achieve the desired data quality; and, ELAB will make small laboratory issues a standing agenda item for future ELAB meetings. | | Recommendation remains open. Awaiting input from ELAB. ELAB continues to include small laboratory issues on agendas. | INACTIVE |
| 38 | 1/14/99 | ELAB recommends to NELAC that the NELAC Accreditation Process and Field Measurements Committees work together to develop a clear definition of critical terms (i.e., field laboratory, mobile laboratory, field measurement, and fixed laboratory) prior to defining the accreditation process for other than fixed laboratories; and, ELAB recommends to NELAC to exclude on-line monitors from its consideration. | | Recommendation remains open. Awaiting response from Accreditation Process and FM committees. Assigned to A. Verstuyft, D. McClure 12/17/99. A. Verstuyft asked Mr. Dan Bivins, OAR, to take recommendation to the Field Sampling Committee for their response at June, 2000 meeting (4/11/00). | HIGH |
| 39 | 1/14/99 | ELAB believes the current EPA proficiency testing program for water is unacceptably limited. ELAB recommends that EPA act quickly to broaden the availability of proficiency testing samples for matrices other than water (e.g. solid waste, air, tissue, etc.) | EPA had no plans for oversight beyond WS/WP, so data base not designed to handle broader program. | Recommendation remains open. Awaiting response from EMMC Policy Council ELAB will send letter to EPA's Cincinnati office requesting an interim status report on the externalization of the WS/WP PT program (6/28/00) | HIGH |

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| 40 | 1/14/99 | ELAB recommends to NELAC that a) the NELAC standards become effective and enforceable one year after adoption, and b) that for the first group of laboratories to be accredited under NELAC standards, the 1999 standards be used for compliance and that the related timelines for acceptance of applications be adjusted accordingly. | | Recommendation remains open. Awaiting response from NELAC Board. | COMPLETED |
| 41 | 12/10/98 | <p>ELAB recommends that work should forge on for field measurement standards. It was agreed that field sampling should be approached to determine the needs of stakeholders for standard-setting.</p> <p>ELAB recommends that the Field Measurements ad hoc committee compile the variability associated with field sampling, collect field sampling protocols, review ISO guides for approaches, consult stakeholders, and re-visit the needs of EPA/OAR on the matter of field sampling.</p> | | <p>Recommendation remains open. Awaiting response from Field Measurements committee.</p> <p>Assigned to A. Verstuyft who will compose a list of key issues for the 4/11/00 teleconference.</p> <p>A. Verstuyft asked Mr. Dan Bivins, OAR, to take recommendation to the Field Measurements Committee for their response at June, 2000 meeting (4/11/00).</p> | HIGH |
| 42 | 3/1/99 | ELAB recommends to NELAC that the lab inspections be done according to NELAC standards and that the national database only track whether a lab is accredited and not have a separate category for interim status. | ELAB, at request of C. Batterton, NELAC BoD, considered the need for a new on-site related to the timing of the first Accrediting Authority recognitions in July 1999. | ELAB letter sent to NELAC, 3/25/99. Awaiting action by NELAC. | COMPLETED |
| 43 | 12/17/99 | Ensure consistency and coordination between USEPA regulations, guidance, and policies and the NELAC standards | | Assigned to Regulatory Consistency subcommittee | HIGH |

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|-------|-------------|--|-------|---|---------------|
| 44 | 12/17/99 | ELAB will address reconciliation & integration of ISO and NELAC standards | | Assigned to NELAC-ISO Consistency subcommittee Ms. Robinson presented overview comparison of ISO 25 and ISO 17025 at open forum 7/26/00, 2000. | INACTIVE |
| 45 | 12/17/99 | ELAB will review reporting information of NELAC national database | | | |
| 46 | 12/17/99 | ELAB will prepare "white paper" on advantages of national laboratory accreditation | | Assigned to National Laboratory Accreditation Issues subcommittee | |
| 47 | 12/17/99 | ELAB to review process for developing PT acceptance limits under privatized PT program relative to regulatory requirements | | Assigned to NELAC PT committee | |
| 48 | 12/17/99 | ELAB will review NELAC Fields of Testing with respect to EPA's structure | | Assigned to Scope of Accreditation subcommittee Subcommittee report summarizing findings has been submitted to ELAB. | |
| 49 | 12/17/99 | ELAB will review issues of QC samples, including field QC and matrix spikes | | Assigned to QC Standards subcommittee | COMPLETED |
| 50 | 2/15/00 | ELAB will send letter to Quality Systems Committee asking that Section 5.12.4 be removed from the Standard. | | Letter sent. Quality Systems Committee denied request. ELAB is taking issue to Accrediting Authorities Committee meeting on 4/18/00 and Board of Directors meeting on 4/13/00. | COMPLETED |

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| 51 | 5/11/00 | ELAB to review proposed Measurement of Source Emissions (MSE) section (7.3) of the proposed Field Activities standard. | | MSE subcommittee formed. | |
| 52 | 6/28/00 | ELAB to appoint a liaison to the NELAC PT Committee's <i>ad hoc</i> subcommittee on PT standardization issues. | | Assigned to C. Hull 6/28/00 | ON-GOING |
| 53. | 6/28/00 | ELAB urges NELAC voting members to adopt all proposed NELAC Standards as presented at the sixth annual voting session with the exception of Appendix D.3 to the Quality Systems Standard. ELAB takes no position on Appendix D.3. | | | COMPLETED |
| 54. | 6/28/00 | ELAB to review language of proposed air testing appendix to NELAC Quality Systems Standard, especially D.5.0 Introduction, for consistency with stack testing workgroup | | Assigned to MSE subcommittee 6/28/00 | |
| 55. | 6/28/00 | ELAB recommends that the NELAC Quality Systems Committee assemble a cross-sectional group of microbiologists (State drinking water and waste water assessors, private and commercial drinking water and waste water laboratories, municipal water systems, EPA personnel responsible for writing the water certification manual, RCRA personnel, etc.) To review and revise the language in Appendix D.3. | | | HIGH |
| 56. | 6/28/00 | ELAB recommends that the NELAP Accrediting Authorities consider the two-tiered states subcontracting issue for resolution of apparent conflict. | | | HIGH |

